

EXHIBIT C

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haeefe, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

January 17, 2020

All Counsel for Merits and Jurisdictional Defendants
Per Attached Counsel List

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Counsel:

Pursuant to the Court's direction at ECF Nos. 5266, 5413 and 5690, the Plaintiffs' Executive Committees write to inform you that the following individuals have been retained by Plaintiffs and may provide expert opinions regarding the topics indicated below. Pursuant to the Court's orders, this letter is being submitted to provide notice to the merits and personal jurisdiction defendants (other than Dallah Avco, Soliman al Buthe, Wa'el Jelaidan, and Yassin al Kadi) concerning the identities of Plaintiffs' contemplated experts and to describe the subject matter of their anticipated reports and testimonies. This notice is not intended to provide a comprehensive recitation of every opinion the experts may offer in their reports, which will be disclosed pursuant to the deadline set by the Court.

Expert	Topics
1. Bergen, Peter	The origin of al Qaeda and background of Osama bin Laden's terrorism, pre-9/11 express intent to attack the West; how and where al Qaeda's and bin Laden's message was spread; fatwahs expressing an intent to attack the West and their import; pre-9/11 attacks against the West; Pre-9/11 knowledge of al Qaeda's and bin Laden's intent to attack West, including the U.S.
2. Jenkins, Brian Michael	The origin, planning, and development of the 9/11 plot (including discussion of various precursors and testing of previous plots); the roles of actors in originating, planning, and developing the plot; the training and selection of operatives; operational aspects of the plot and attack; and the events of the day of the 9/11 attacks.

3. Kohlmann, Evan The involvement of the MWL, IIRO, and WAMY in providing material support and resources to al Qaeda and its affiliates; the involvement of the MWL, IIRO, and WAMY in conspiring with and aiding and abetting al Qaeda's targeting of the United States; financial irregularities and practices on the part of the MWL, IIRO, and WAMY that reflect typical terrorist financing modes and methodologies; the ways in which the support provided by the MWL, IIRO, and WAMY enhanced al Qaeda's global strike capabilities and enabled the 9/11 attacks; the concept of da'awa, and the missions, objectives, and activities of the MWL, IIRO, and WAMY; the organizational and financial structures of the MWL, IIRO and WAMY and evidence that their material support of al Qaeda and affiliated organizations was conducted with the awareness and knowledge of the senior officials who headed those organizations.
4. Levitt, Matthew The origin, evolution, mission, and development of al Qaeda, its development in the Sudan and its transition to Afghanistan; the history of Osama bin Laden's decision to target and attack the West (including the US, and including the history of early fatwas); and addressing whether people working with Osama bin Laden and other al Qaeda-related entities would know of bin Laden's and Al Qaeda's mission; the role of ostensible charitable organizations (specifically, MWL, IIRO, WAMY, and al Haramain) in providing financing and other material support to bin Laden and al Qaeda-related entities leading into the 9/11 attacks; the concept of da'awa, and the missions, objectives, and activities of the MWL, IIRO, and WAMY.
5. Shavit, Uriya Al Qaeda's ideological and intellectual origins; the ideological orientation and activities of MWL and how those aligned with al Qaeda's religious justification for targeting the US and enhanced its financial and operational capabilities.
6. Tamm, Quinn John Jr. The development of the 9/11 plot and operational aspects of the plot and attacks.
7. Winer, Jonathan Al Qaeda's pre-9/11 financial needs and sources of funding; the role of ostensible charities in providing funding and other resources to al Qaeda; the manner that support to al Qaeda enhanced al Qaeda's strike capabilities to enable it to carry out the 9/11 attacks; the types of programs ostensible charities exploited as cover to channel resources to al Qaeda; the existence or absence of internal records of ostensible charities supporting al Qaeda; financial improprieties and irregularities reflected in audits and financial documents of ostensible charities; whether, and if so, how, al Qaeda used its relationships with ostensible charities to channel resources to aligned terrorist organizations and causes; how those activities advances al Qaeda's terrorist mission; the

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role of ostensible charities in providing support to Al Qaeda pre-9/11 and its immediate aftermath; the distinction, if any, between material support given for humanitarian purposes or terrorism purposes; the purpose and operation of the EO 13224 and UN designation programs; the significance and import of the U.S. government's engagements with Emirati officials concerning Dubai Islamic Bank prior to 9/11 and State Department spokesman James Foley's statements relating to those engagements, and the significance and import of the investigations and account closures described in the testimony of Alan Fine.

Sincerely,

COZEN O'CONNOR

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